CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

75-669

ADMINISTRATIVE DOCUMENTS

THIS APPROVAL SUMMARY SUPERSEDES THE APPROVAL SUMMARY COMPLETED 8/4/00
REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

ANDA Number: 75-669 Date of Submission: June 30, 2000

Applicant's Name: Faulding Pharmaceutical Corporation

Established Name: Famotidine Injection, 10 mg/mL Preservative Free

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

Do you have 12 Final Printed Labels and Labeling? YES

- Container Labels: FPL submitted in the 6/30/00 amendment is satisfactory for approval.
- Carton Labeling: FPL submitted in the 6/30/00 amendment is satisfactory for approval.
- Package Insert Labeling: FPL submitted in the 6/30/00 amendment is satisfactory for approval

Revisions needed post-approval:

1. CONTAINER

   Add "Single-dose" to the principal display panel.

2. INSERT

   a. GENERAL

      i. Please note that the subsection headings are inconsistent throughout the insert. Initially in the insert, the first letter of each word in the subsection heading is capitalized however, in the later sections, all the letters of the some of the subsection headings are capitalized. Revise your subsection heading to be consistent throughout the insert and also revise the reference to these subsections accordingly.

      ii. Submit combined insert labeling to include labeling for ANDA 75-705.

   b. CLINICAL PHARMACOLOGY IN ADULTS (Gastric Ulcer)

      Delete the comma between "Time to complete" and "relief of daytime and..."

   c. CLINICAL PHARMACOLOGY IN PEDIATRIC PATIENTS (Pharmacokinetics)

      Revise the first sentence of the third paragraph to read "...Bioavailability studies of 8 pediatric patients (11-15 years of age) showed..."

   d. INDICATIONS AND USAGE

      The first letter of each word in "Disease Diagnosed By Endoscopy" and "Multiple Endocrine Adenomas" in the fourth and fifth conditions do not need to be capitalized.

   e. DOSAGE AND ADMINISTRATION

      Replace the parenthesis around "see HOW SUPPLIED" with a hyphen between "temperature" and "see" in the last paragraph.

BASIS OF APPROVAL:

- Was this approval based upon a petition? NO
- What is the RLD on the 356(h) form: Pepcid (famotidine) Injection
- NDA Number: NDA 19-510

- NDA Drug Name: PEPCID INJECTION
- NDA Firm: Merck Research Laboratories
- Date of Approval of NDA Insert and supplement #: March 18, 1999; S-026
- Has this been verified by the MIS system for the NDA? YES
- Was this approval based upon an OGD labeling guidance? NO
- Basis of Approval for the Container Labels: SIDE BY SIDE
- Basis of Approval for the Carton Labeling: SIDE BY SIDE

Other Comments:

FOR THE RECORD:

1. MODEL LABELING: Review based on the labeling of NDA 19-510/S-026, issued November 1998; approved March 18, 1999.

2. INACTIVE INGREDIENTS: The inactive ingredients listed on the labels and labeling are in accord with the inactive ingredients listed in the application.

3. PATENTS/EXCLUSIVITIES: Firm cites Paragraph III certification for U.S. Patent Number 4,283,408 which expires October 15, 2000. Firms states that there is no exclusivity period for Pepcid Injection. Firm's statement is correct.

4. STORAGE TEMPERATURE RECOMMENDATIONS COMPARISON
   - NDA – Store PEPCID injection at 2-8^{0}C (36-46^{0}F). If solution freezes, bring to room temperature; allow sufficient time to solubilize all the components.
   - ANDA – Identical to the NDA except for the brand name.
   - USP- "Preserve in well-closed containers, protected from light."

5. PACKAGING CONFIGURATION
   The innovator markets their product as a single dose 20 mg/2 mL vial in cartons of 10s. Faulding proposes to market their product in the identical manner.

6. CONTAINER/CLOSURE: See Vol. 1.2, page 403.

7. OUTSIDE FIRMS: none

8. The package insert labeling of ANDA 75-705 includes this application's product.

Date of Review: November 21, 2000 Date of Submission: June 30, 2000

Primary Reviewer: Koung Lee Date: 11/21/00

Team Leader: Charlie Hoppes Date: 11/21/00

cc:

I.LABELING

REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

ANDA Number: 75-669 Date of Submission: February 10, 2000

Applicant's Name: Faulding Pharmaceutical Corporation

Established Name: Famotidine Injection, 10 mg/mL Preservative Free

Labeling Deficiencies:

1. CONTAINER – 2 mL (July 9, 1999 submission)

   Upon further review, we have the following comments.

   a. Your container labels appear to be larger than an actual size. Please note that for computer generated labels to be acceptable as final print, they must be of actual size, color and clarity. Please assure that these criteria are met prior to submission of final print.

   b. Revise the net quantity statement to read "2 mL vial" or "2 mL Single-dose vial" with deletion of "Single Dose Vial" appearing on the bottom of the principal display panel.

   c. Revise the route of administration to read "FOR IV USE ONLY AFTER DILUTION.".

   d. Include "Discard unused portion.", if space permits.

2. CARTON – 10 x 2 mL (July 9, 1999 submission)

   a. See applicable comments above under CONTAINER.

   b. You may revise the net quantity statement to read "10 x 2 mL Single-dose vials" with deletion of "Single Dose Vial" appearing on the bottom".

   c. Revise the route of administration to read "FOR INTRAVENOUS USE ONLY AFTER DILUTION.".

   d. Include the statement "Discard unused portion".

3. INSERT – DOSAGE AND ADMINISTRATION

   a. Pathological Hypersecretory Conditions

      Since the text under this subsection is a part of this section, it is not necessary to make references back to this section. Please revise "(see Dosage and Administration, Famotidine Injection) to read "(See Stability, Famotidine Injection)" in two instances as you have originally proposed.

   b. Stability

      Increase the prominence of this subsection heading to be consistent with other subsection headings.

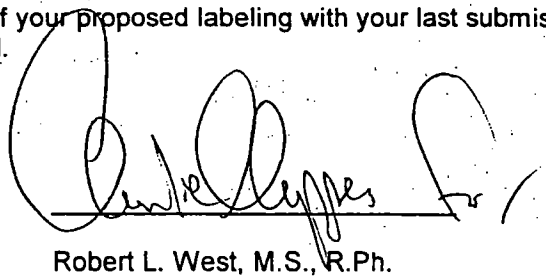
Please revise your labeling as instructed above and submit draft labeling for a tentative approval or 12 final printed copies of labels and labeling for a full approval of this application. If draft labeling is provided, please be advised that you will be required to submit 12 final printed copies of all labeling at

least 60 days prior to full approval of this application. In addition, you should be aware that color and other factors (print size, prominence, etc.) in final printed labeling could be found unacceptable and that further changes might be requested prior to approval.

Prior to approval, it may be necessary to further revise your labeling subsequent to approved changes for the reference listed drug. We suggest that you routinely monitor the following website for any approved changes –

http://www.fda.gov/cder/ogd/rld/labeling_review_branch.html

To facilitate review of your next submission, and in accordance with 21 CFR 314.94(a)(8)(iv), please provide a side-by-side comparison of your proposed labeling with your last submission with all differences annotated and explained.



Robert L. West, M.S., R.Ph.
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

ANDA Number: 75-669 Date of Submission: July 9, 1999

Applicant's Name: Faulding Pharmaceutical Corporation

Established Name: Famotidine Injection, 10 mg/mL Preservative Free

Labeling Deficiencies:

INSERT

1. GENERAL

Differentiate the subsection headings from the section headings and be consistent when referring back to the subsections (e.g., For the "Clinical Studies" subsection, reference to this section should be stated as "(see CLINICAL PHARMACOLOGY IN ADULTS, Clinical Studies)".

2. DESCRIPTION

Revise the molecular weight to read 337.45.

3. CLINICAL PHARMACOLOGY IN ADULTS

a. Gastroesophageal Reflux Disease (GERD)

i. End the first sentence of the first paragraph after the word "esophagus" and start new sentence with "Famotidine 20 mg b.i.d. was..."

ii. Tables 4 and 5 are incomplete. The p values are not identified correctly.

iii. Separate the last two sentences from the fourth paragraph to form a new paragraph.

b. Pathological Hypersecretory Conditions

Replace "i.e." with "e.g."

4. CLINICAL PHARMACOLOGY IN PEDIATRIC PATIENTS

a. For patients 1-11 years, the total clearance should read "0.54 ± 0.34" in Table 6.

b. Delete "of" in the third paragraph between "...in pediatric patients" and "11-15 years of age..."

c. Add a superscript "a" to "Effect" in Table 8.

5. INDICATIONS AND USAGE

Replace "i.e." with "e.g." in the fifth indication.

6. ADVERSE REACTIONS

Revise the first sentence of the last paragraph to read as "...with Famotidine for Oral Suspension, Famotidine Orally Disintegrating Tablets, Famotidine Injection Preservative Free in Plastic Container or Famotidine Injection."

7. DOSAGE AND ADMINISTRATION

a. Pathological Hypersecretory Conditions

Replace "i.e." with "e.g.".

b. Famotidine Injection

i. Add ",Storage" after "see HOW SUPPLIED" in the first and second paragraphs.

ii. Replace the parenthesis around "see HOW SUPPLIED" with a hyphen between "temperature" and "see" in the second paragraph.

8. HOW SUPPLIED

Add the subsection heading "Storage" before the last two paragraphs.

Please revise your labeling as instructed above and submit draft package insert labeling for a tentative approval or 12 final printed copies of labels and labeling for a full approval of this application. If draft labeling is provided, please be advised that you will be required to submit 12 final printed copies of all labeling at least 60 days prior to full approval of this application. In addition, you should be aware that color and other factors (print size, prominence, etc.) in final printed labeling could be found unacceptable and that further changes might be requested prior to approval.

Prior to approval, it may be necessary to further revise your labeling subsequent to approved changes for the reference listed drug. We suggest that you routinely monitor the following website for any approved changes –

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To facilitate review of your next submission, and in accordance with 21 CFR 314.94(a)(8)(iv), please provide a side-by-side comparison of your proposed labeling with your last submission with all differences annotated and explained.

Robert L. West, M.S., R.Ph.
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

Do you have 12 Final Printed Labels and Labeling?

- Container Labels:
- Professional Package Insert Labeling:

Revisions needed post-approval:

BASIS OF APPROVAL:

• Was this approval based upon a petition?	NO
• What is the RLD on the 356(h) form:	Pepcid (famotidine) Injection Premixed
• NDA Number:	NDA 20-249
• NDA Drug Name:	PEPCID
• NDA Firm:	Merck Research Laboratories
• Date of Approval of NDA Insert and supplement #:	March 18, 1999; S-009
• Has this been verified by the MIS system for the NDA?	YES
• Was this approval based upon an OGD labeling guidance?	NO
• Basis of Approval for the Container Labels:	SIDE BY SIDE
• Basis of Approval for the Carton Labeling:	SIDE BY SIDE

Other Comments:

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 23		X	
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?		X	
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)	**Yes**	**No**	**N.A.**
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributed statement incorrect or falsely inconsistent between labels and labelling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.			X
Scoring. Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			X
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			X
Inactive ingredients: (FTR: List page # in application where inactives are listed)			
		X	

Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?			
Do any of the inactives differ in concentration for the route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in nitrates)?			X
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?		X	
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?		X	
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)		X	
USP issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?		X	
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?	X		
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence issues: (Compare bioequivalency values: Insert to study. List Cmax, Tmax, T 1/2 and date study acceptable)			
Insert labeling references a food effect or a no-effect? If so, was a food study done?		X	
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity issues?: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.	X		

FOR THE RECORD:

1. MODEL LABELING: Review based on the labeling of NDA 20-249/S-009, issued November 1998; approved March 18, 1999.

2. INACTIVE INGREDIENTS: The inactive ingredients listed on the labels and labeling are in accord with the inactive ingredients listed in the application.

3. PATENTS/EXCLUSIVITIES: Firm cites Paragraph III certification for U.S. Patent Number 4,283,408 which expires October 15, 2000. Firms states that there is no exclusivity period for Pepcid Injection. Firm's statement is correct.

4. STORAGE TEMPERATURE RECOMMENDATIONS COMPARISON
   - NDA – Store PEPCID injection at 2-8^{0}C (36-46^{0}F). If solution freezes, bring to room temperature; allow sufficient time to solubilize all the components.
   - ANDA – Identical to the NDA except for the brand name.
   - USP- "Preserve in well-closed containers, protected from light."

5. PACKAGING CONFIGURATION
   The innovator markets their product as a single dose 20 mg/2 mL vial in cartons of 10s. Faulding proposes to market their product in the identical manner.

6. CONTAINER/CLOSURE: See Vol. 1.2, page 403.

7. OUTSIDE FIRMS: none

Date of Review: January 4, 2000 Date of Submission: July 9, 1999

Primary Reviewer: Koung Lee Date: 1/7/00

Team Leader: Charlie Hoppes Date: 1/11/00

cc: ANDA: 75-669
DUP/DIVISION FILE
HFD-613/KLee/CHoppes (no cc)
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ANDA 75-669

Faulding Pharmaceutical Co.
11 Commerce Drive
Cranford, New Jersey 07016

AUG 4 1999

Dear Sir:

We acknowledge the receipt of your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act.

NAME OF DRUG: Famotidine Injection, 10 mg/mL Preservative Free

DATE OF APPLICATION: July 9, 1999

DATE (RECEIVED) ACCEPTABLE FOR FILING: July 12, 1999

We will correspond with you further after we have had the opportunity to review the application.

Please identify any communications concerning this application with the ANDA number shown above.

Should you have questions concerning this application, contact:

Kassandra Sherrod
Project Manager
(301) 827-5848

Sincerely yours,

Harvey G. Meeley for

Robert L. West, M.S., R.Ph.
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research